UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

[1] FRANKIE ANDREW QUINTANILLA,

- [4] KIOMAR ABDIEL GOMEZ-RAMIREZ,
- [5] MANUEL REFUJIO QUINTANILLA, aka MANNY,
- [6] NATHANIEL DANIEL ANAYA,

[10] MARTA IRIS RAMIREZ-LOPEZ,

Defendants.

INDICTMENT

CRIMINAL NO. 25- 107 (CVR)

VIOLATIONS:

21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii), (b)(1)(A)(vi), and 846

18 U.S.C. §§ 2320(a)(4), (b)(1) and 2

(Two Counts & Forfeiture Allegation)



THE GRAND JURY CHARGES:

COUNT ONE

Conspiracy to Possess with Intent to Distribute Controlled Substance 21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(vi), and 846

Beginning on a date unknown, but not later than in or about December 2023, continuing up to and until the return of this Indictment, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] FRANKIE ANDREW QUINTANILLA,

- [4] KIOMAR ABDIEL GOMEZ-RAMIREZ,
- [5] MANUEL REFUJIO QUINTANILLA, aka MANNY,
- [6] NATHANIEL DANIEL ANAYA,

[10] MARTA IRIS RAMIREZ-LOPEZ,

the defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and other persons, known and unknown to the Grand Jury, to possess with intent to distribute and to distribute four hundred (400) grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4- piperidinyl] propanamide, a Schedule II Narcotic Drug Controlled Substance All in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(vi), and 846.

COUNT TWO Trafficking in Counterfeit Drugs 18 U.S.C. § 2320(a)(4)

On or about July 2024, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] FRANKIE ANDREW QUINTANILLA,

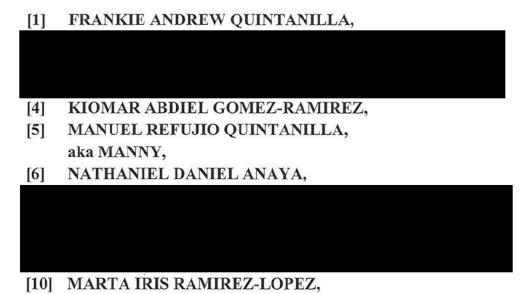
the defendant herein, aided and abetted by others, known and unknown to the Grand Jury, did knowingly and intentionally traffic in a counterfeit drug, that is N-phenyl-N-[1-(2-

phenylethyl)-4- piperidinyl] propenamide tablets that bore a counterfeit mark, that is, the word "M30." All in violation of 18 U.S.C. §§ 2320(a)(4) & (b)(1), and 2.

NARCOTICS FORFEITURE ALLEGATION 21 U.S.C. § 853

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

Pursuant to 21 U.S.C. § 853, upon conviction of the controlled substance offense alleged in Count One of this Indictment,



the defendants herein, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said offenses.

If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

TRUE BILL

FOREPERSON

Date: Maccu - 5-2025

W. Stephen Muldrow United States Attorney

Max Pérez-Bouret

Assistant United States Attorney, Chief Transnational Organized Crime Section

María L. Montañez-Concepción

Assistant U.S. Attorney, Deputy Chief

Transnational Organized Crime Section

Helena B. Daniel

Special Assistant United States Attorney